EASTERN DIVISION

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO CLERK OF COURT

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UNITED STATES OF AMERICA,

Plaintiff,

 $\mathbf{v}_{\boldsymbol{\cdot}}$

ANGELA HUNT, aka "Ang,"

Defendant.

CASE NO

JUDGE

INFORMATION

18 U.S.C. § 1952(a)(3)(A)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 846

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl and Cocaine Base)

1. Between on or about January 1, 2008, through and including June 29, 2022, in the Southern District of Ohio and elsewhere, the defendant, ANGELA HUNT, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the United States Attorney, including PATRICK M. SAULTZ, aka "White Boy Pat," CORDELL A. WASHINGTON, aka "Corey," aka "Dub," aka "Bro," DAVID E. PRICE, aka "DP," ALLISON E. SMITH, aka "Alli," TAVARYYUAN JOHNSON, aka "Gucci," aka "TJ," TYLER N. BOURDO, ALEXIS C. LEWIS, MICHAEL D. FOWLER, CARMELA BROOKS, DUSTIN A. SPEAKMAN, aka "Dawg," DANNY G. MULLINS, ANTHONY B. FRIERSON, aka "Royal," MICHAEL D. BURTON, BRIANK. LONG II, CAITLIN R.S. DUFF, MITCHELL A. POWERS, VINCENT T. GRIFFIN, ROBERT L. PYLES, aka "Pork," GABRIEL R. SMITH, aka "Gabe," BRITTANY A. WILLIAMS, LAUREN E. BREZNY, and ROBERT E. TINSLEY III, aka "Cam," to distribute and possess with intent to distribute a mixture and substance containing a detectable

amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidnyl] propanamide, commonly referred to as "fentanyl," a Schedule II controlled substance; and a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack," a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 846.

COUNT TWO

(Use of Facility of Interstate Commerce in Aid of Racketeering)

2. From between in or about 2021 and continuing through at least February 2022, the exact dates being unknown, in the Southern District of Ohio, and elsewhere, the defendant, ANGELA HUNT, did knowingly use an instrumentality of interstate and foreign commerce, namely cellphones and the internet, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, that is, a business enterprise involving prostitution offenses by means of force, fraud, and coercion, in violation of the laws of the State of Ohio (O.R.C. § 2905.32(A)) and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on, of such unlawful activity.

In violation of 18 U.S.C § 1952(a)(3)(A).

FORFEITURE ALLEGATION

- 3. The allegations of this Information are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America.
- 4. Upon conviction of any offense alleged in this Information, the defendant,

 ANGELA HUNT, shall forfeit to the United States all of her right, title, and interest in:
 - a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the offenses in violation of 21 U.S.C. §§ 841 and/or 846 as alleged in this Information, and any property used, or intended

to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, in accordance with 21 U.S.C. § 853(a)(1) and (2);

including, but not limited to:

The following property seized on or about August 4, 2021, from 139 South Princeton, Columbus, Ohio:

- One Alcatel TCL 503ZW Cellphone with associated IMEI#015552000525256;
- Approximately \$9,701 in United States Currency; and

The following property seized on or about February 16, 2022, from 634 South Ogden, Columbus, Ohio:

- One MotoG Power Cellphone with associated IMEI# 356892112841572; and
- Approximately \$2,688 in United States Currency.

Forfeiture notice pursuant to 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

KENNETH L. PARKER United States Attorney

EMILY CZERNIEJEWSKI (IL 6308829) TIMOTHY D. PRICHARD (OH 0059455)

Assistant United States Attorneys

Emily Gernyaste